

Blumberg & Wolk, LLC

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Attorneys for Defendants, Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, and Kimberley Yvette Smith, M.D., a/k/a Kimberley Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Richard C. DiVerniero, M.D., Richard Strauss, M.D., *et al*

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MASSACHUSETTS**

IN RE NEW ENGLAND
COMPOUNDING PHARMACY, INC.
PRODUCTS LIABILITY
LITIGATION

This document relates to:
All New Jersey Cases

Docket No. 1:13-md-2419-RWZ
MDL No. 02419

Premier's Notice of Filing of Deposition Notices

The Defendant, Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, and Kimberley Yvette Smith, M.D., a/k/a Kimberley Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Richard C. DiVerniero, M.D., Richard Strauss, M.D.,

et al give notice to the Court and to all parties that it has issued deposition notices to the following:

- 1. Inspira Health Network (formerly South Jersey HealthCare) 30(b)(6) on June 22, 2015**
- 2. Joseph Alessandrini, R.Ph on June 209, 2015**

The notices were separately emailed and/or mailed to (1) the deponents or their counsel and (2) directly involved counsel. The depositions are being taken pursuant to the deposition protocol previously entered by the Court and attached hereto. This notice is to ensure that all parties have notice.

Dated: May 15, 2015

Respectfully submitted,

Blumberg & Wolk, LLC

Attorneys for: Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, and Kimberley Yvette Smith, M.D., a/k/a Kimberley Yvette Smith-Martin, M.D., *et al*

/s/Christopher M. Wolk, Esq.

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CERTIFICATE OF SERVICE

The undersigned hereby certified that on May 15, 2015, a true and exact copy of the foregoing was filed with this the Clerk of the Court using the ECF system that sent a notification of this filing to all ECF registered counsel of record via email generated by the Court's ECF system.

Respectfully submitted,

Blumberg & Wolk, LLC

Attorneys for: Premier Orthopaedic
and Sports Medicine Associates of
Southern New Jersey, LLC, trading as
Premier Orthopaedic Associates,
Premier Orthopaedic Associates
Surgical Center, LLC, and Kimberley
Yvette Smith, M.D., a/k/a Kimberley
Yvette Smith-Martin, M.D., *et al*

/s/Christopher M. Wolk, Esq

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